

6. Alternatives

CEQA Guidelines §15126.6 requires that an EIR consider alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. In compliance with CEQA, alternatives are presented here for this project. Each of the alternatives has been evaluated against the project objectives as stated in the Project Description (Section 3.5, Statement of Objectives, page 3-35) of this EIR. A statement as to whether those objectives can be met under these alternatives is included. The project objectives include the following (not listed in any particular ranked order):

- Create an environment that promotes increased revenues to support community services and transform the City's economy.
- Provide an established vision and create a land use plan for reuse of critical parcels so that the next phase of community investment and improvement can begin.
- Provide and implement a DTSP land use plan that promotes orderly and viable development and that also meets the needs of visitors (including tourism), residents and businesses.
- Provide development standards and design guidelines that encourage development of underused parcels with a mix of uses and unique architecture that will complement the existing uses in the DTSP.
- Provide adequate parking that is also incorporated into the framework of pedestrian pathways within the downtown.
- Establish and maintain efficient on-site and off-site traffic circulation.
- Implement green and sustainable building practices, where appropriate and feasible.

As required by §15126.6(c) of the CEQA Guidelines, a reasonable array of alternatives has been presented herein. The EIR itself, as well as the "Alternatives" section provides adequate documentary material from which to construct any permutation of alternatives on the project. Therefore, this Alternatives section is intended to present a reasonable range of alternatives for discussion and evaluation in compliance with CEQA and the CEQA Guidelines.

The following discussion describes and evaluates three alternatives including the CEQA Guidelines §15126.6(e) mandated "no project alternative" and two additional alternatives. The alternatives considered include the following:

- The No Project Alternative
- Conservative Market Demand Development Alternative
- Reduced Development Alternative

Table 6.4.1 provides a comparison summary of the topical areas (e.g., aesthetics, air quality, transportation) of each alternative to the proposed project.

6.1 No Project Alternative

The No Project Alternative would involve the potential development of the 336-acre project area per the existing DTSP. This alternative assumes that future development that could potentially occur within the DTSP Update area would do so per the existing approved DTSP. CEQA Guidelines §15126.6(3)(A) identifies that, when the project is a revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of that existing plan, policy, or operation into the future. Therefore, this alternative assumes that development would occur as approved and allowable under the existing DTSP. It is difficult to determine the amount of development that could occur under the existing DTSP. However, development under the existing DTSP is constrained under the existing conditions (area is near build-out) with the exception of a few scattered vacant lots.

The following provides a summary of the comparison of the environmental impacts associated with the “existing Specific Plan” to the proposed project for each environmental topical area:

- Aesthetics – This alternative proposes that development could occur per the development standards and permitted uses under the existing DTSP. This alternative could potentially reduce impacts associated with aesthetics to the extent the building height and massing and density were to be reduced. A project’s lighting under this alternative would be required to meet City design standards as with the proposed project. Because these are similar to existing, impacts related to lighting would be the same. The difference in potential aesthetics impacts would vary depending on specific project details, including location of the specific development proposal and building/site design. However, where height standards are proposed to be changed near areas that permit lower heights, aesthetics impacts would be reduced under the No Project Alternative.
- Air Quality – The development of this alternative would result in reduced impacts to air quality compared to that of the proposed project. Because the proposed project’s air quality impacts were determined to be significant, the reduced air emissions associated with this project alternative would represent a significant benefit in the context of the overall project. Again it would depend on the individual projects being brought forward for consideration. Overall, the proposed DTSP Update does increase development beyond that contemplated by the existing DTSP.
- Cultural Resources – The development of this alternative would not necessarily result in reduced impacts to cultural resources. All development projects would be evaluated on a project-by-project basis taking into consideration the individual project locations, construction, and design. A project could be potentially developed on a site that contains cultural resources (e.g., a historical building) without the

proposed DTSP Update project. However, the DTSP Update proposes changes in development standards, permitted uses, and administrative provisions (including a Cultural Arts Overlay) that would present greater opportunities for development and make it more likely for development to be proposed. Since a project could be developed regardless of the proposed DTSP Update (although less development may occur), this alternative does not necessarily reduce or eliminate any significant impacts to cultural resources.

- Geology/Soils – The alternative does not reduce any significant impacts to geology and soils from those associated with the proposed project. A property would be graded in conjunction with this alternative or the proposed project (DTSP Update). Regardless of the project alternative, all projects (any development) at a property will necessitate site preparation including grading (potential excavation depending on design) and possibly demolition of existing structures to accommodate new development.
- Hazards/Hazardous Materials – Regardless of the project alternative, all development projects would be evaluated on a project-by-project basis and would be required to comply with applicable requirements relative to hazards and/or hazardous materials (e.g., storage, transport). Therefore, this alternative does not reduce or eliminate any significant impacts to hazards/hazardous materials.
- Hydrology/Water Quality – The alternative would not result in a reduction of impacts relative to hydrology and water quality. The impacts associated with implementation of this alternative would be nearly the same as that of the proposed project. This alternative would require water and infrastructure connections, and would also have the same type and level of impacts to water quality as the proposed project (DTSP Update). Therefore, potential impacts to hydrology and water quality would not be significantly less than that of the proposed project. All development projects, regardless of project alternative, would be subject to compliance with applicable hydrology/drainage and water quality requirements. Therefore, this alternative does not reduce or eliminate any significant impacts to hydrology and water quality.
- Land Use and Planning – Development under this project alternative would not require an amendment to the current General Plan and zoning. Therefore, this alternative does not conflict with the existing General Plan. The proposed project does require an amendment to the General Plan and amendment to the Zoning Map in order to reflect the proposed DTSP Update changes. The amendments are proposed to provide consistency among the regulatory and planning documents. Although the proposed project would amend the General Plan, these amendments do not modify anything that would be for the purpose of avoiding and/or reducing a potential physical environmental impact. The amendment primarily consists of text, table, and map revisions consistent with the proposed DTSP Update. The project alternative would not meet the project objectives. Properties within the DTSP area that could

potentially be developed (or redeveloped) may remain underutilized and therefore would not serve their full potential that meets the needs of residents, visitors, tourist-serving uses, businesses, and the economic viability of the Downtown area, whereas the proposed DTSP Update will provide for the potential development of 213,467 square feet of retail uses, 92,332 square feet of restaurant uses, 92,784 square feet of office uses, 235 hotel rooms, 648 residential units, and 30,000 square feet of cultural arts center.

- Noise – This alternative could potentially result in fewer noise impacts than those of the proposed project due to the reduction in overall development (less construction, pile driving); however, it would not eliminate significant noise impacts. Long-term noise associated with the project alternative and the proposed project would include traffic noise (vehicular trips), parking area noise, and noise commonly associated with urbanized development.
- Population and Housing – This alternative would allow for additional housing but not necessarily at the amount proposed with project. The proposed DTSP Update provides that the development potential that could occur would be 648 residential units. As with the No Project Alternative (assuming additional housing were to be constructed), these potential units would serve to help fulfill the City's housing needs per the SCAG Regional Housing Needs Assessment. The No Project Alternative does not reduce or eliminate any significant impacts associated with population and housing.
- Public Services – This alternative would have fewer impacts to public services than those associated with the proposed project, since it could be likely that development would not occur at the same intensity as it would with the proposed DTSP Update. Therefore, it is possible that this alternative would reduce or eliminate significant impacts to public services, including for example, the significant and unavoidable adverse impact to public services (e.g., fire).
- Recreation – The No Project Alternative would result in reduced impacts to recreation. The proposed DTSP Update will generate an increase in population of 1,562 people, which will add to the demand on recreation. However, within the DTSP area, the recreation amenities (including the beaches) are sufficient to meet the requirements (e.g., parks) of the population. Additionally, all future development projects would be evaluated on a project-by-project basis and would be required to comply with applicable City requirements (e.g., for payment of park impact fees and/or dedication of land). Therefore, although the proposed project does not result in any significant impacts to recreation, the No Project Alternative would result in reduced recreation impacts.
- Transportation – The No Project Alternative would result in fewer long-term traffic impacts than the proposed project because vehicle trips associated with the alternative

compared to the project are reduced. However, all traffic impacts can be mitigated to a less than significant level with the proposed DTSP Update. Additionally, the DTSP Update proposes transportation/circulation improvement options that would be a beneficial impact to the Downtown area, whereas the existing DTSP (No Project Alternative) does not. Overall, the No Project Alternative could potentially result in few traffic impacts assuming less development were to occur under this alternative compared to the identified full development potential proposed with the DTSP Updated project.

- Utilities and Service Systems– The No Project Alternative would have less impacts to utilities and service systems as that associated with the proposed DTSP Update project. The alternative would result in a reduction of impacts (e.g., need for additional/expanded facilities and services) to this topical area. However, utilities and service systems would still need to be provided for development under existing DTSP just as with the proposed project. Regardless, all new development would be subject to review and evaluation for capacity needs and availability of service at the time the project development was brought forward for consideration.

In summary, the No Project Alternative would reduce impacts; including those that have been determined to be significant and unavoidable (including air quality and public services). The No Project Alternative would have fewer impacts on air quality, hydrology/water quality, noise, land use, public services, transportation/parking, recreation, and utilities and service systems than those associated with the proposed project. However, impacts to cultural resources (which have been determined to be a significant and unavoidable impact to historical resources) would not necessarily be reduced by the No Project Alternative. Development allowed per the existing DTSP could continue and could potentially impact historical resources. The potential impacts of the proposed project can be mitigated or have been found to be less than significant for many of the topical areas except for air quality, cultural resources, and public services. Additionally, the No Project Alternative does not fulfill all of the project objectives identified for the proposed DTSP Update.

6.2 Conservative Market Demand Development Alternative

This alternative assumes development potential based on studying conservative marked demand. The conservative development potential identified per the market demand analysis conducted during the preparation of the proposed DTSP Update identifies the following; 203,350 square feet of retail (213,467 proposed with DTSP Update), 75,783 square feet of restaurant uses (92,332 proposed with DTSP Update), 108,814 square feet of office uses (92,784 proposed with DTSP Update), 268 residential units (648 proposed units with DTSP Update), no hotel development (235 hotel rooms proposed with DTSP Update), and 30,000 square feet of cultural arts center (same as DTSP Update). Since this alternative assumes similar square footages for retail, restaurant, and office, and includes residential (no hotel uses would be proposed), it is reasonable to consider that the development regulations (e.g., densities, building heights, and setbacks) proposed for the DTSP Update could also

apply to the Conservative Market Demand Development Alternative. Therefore, the following analysis is considers this assumption.

- Aesthetics – This alternative would not necessarily reduce impacts associated with aesthetics to the extent the building height and massing and density of individual projects would still be allowed per the proposed development regulations of the DTSP Update. The areas of differences are those associated with the reduction in overall development that would occur, specifically residential, hotel, retail, and restaurant uses. The reduction in aesthetics impacts would not be significantly different with this project alternative than the proposed DTSP Update project because all other uses are within square footage ranges. Additionally, all projects would be required to meet City design standards as with the proposed project. The difference in potential aesthetics impacts would vary depending upon specific project details including site location (e.g., parcel) of the project proposal and building/site design.
- Air Quality – This alternative would result in reduced impacts to air quality compared to the proposed project due to the reduction in overall development that would occur, specifically for residential, hotel, retail, and restaurant uses (with the exception of office, which is slightly greater than the proposed project).
- Cultural Resources – This alternative would not necessarily result in reduced impacts to cultural resources. All development projects would be evaluated on a project-by-project basis taking into consideration the individual project locations, construction and design. Therefore, this alternative does not reduce or eliminate any significant impacts to cultural resources.
- Geology/Soils – The alternative does not reduce impacts relative to geology and soils from that associated with the proposed project. Properties would potentially be graded (or structures demolished to accommodate new development) in conjunction with the alternative or the proposed project (DTSP Update). All development construction projects (any development) will necessitate some degree of site preparation. The extent of the site preparation associated with the development would depend on each individual project proposal. Therefore, this alternative does not reduce or eliminate any significant impacts to geology/soils.
- Hazards/Hazardous Materials – All development projects would be evaluated on a project-by-project basis and would be required to comply with applicable requirements relative to hazards and/or hazardous materials (e.g., storage, transport). This alternative would also allow for potential new development opportunities per the proposed DTSP Update. Since the project alternative would also propose development within the Specific Plan area, this alternative does not reduce or eliminate the potential for significant impacts associated with hazards/hazardous materials. Therefore, implementation of this project alternative will not reduce any significant impacts relative to hazards/hazardous materials.

- Hydrology/Water Quality – The alternative would not result in a reduction of impacts relative to hydrology and water quality. The impacts associated with implementation of this alternative would be nearly the same as that of the proposed project. This alternative would require water and infrastructure connections, and would also have the same type and level of impacts to water quality as the proposed project. Therefore, potential impacts to hydrology and water quality would not be significantly less than that of the proposed project. All development projects regardless of project alternative would be subject to compliance with applicable hydrology/drainage and water quality requirements.
- Land Use and Planning – Development under this project alternative would also require an amendment to the current General Plan and the DTSP. The amendments would be necessitated to provide consistency between the DTSP and General Plan. The project alternative does not reduce and/or eliminate a significant impact to land use. Additionally, this alternative does not meet the project objectives. This alternative provides significantly less housing, no hotel development and less retail and restaurant. As such, this alternative would not meet the economic needs of the area nor the overall housing needs identified for the City. This alternative (with no hotel development) also does not meet the objective to promote tourism/visitors.
- Noise – This alternative could potentially result in less noise impacts than that of the proposed project due to the slight reduction in overall development. Long-term noise associated with the project alternative and the proposed project would include traffic noise (vehicular trips), parking area noise, and noise commonly associated with urbanized development. Therefore, the project alternative does not reduce or eliminate any significant impacts or unavoidable adverse impacts to noise.
- Population and Housing – The alternative would provide approximately 41% of the additional housing that is proposed by the new development potential of the DTSP Update. This alternative would call for the potential development of 268 residential units compared to 648 units identified with the proposed project. The proposed housing is needed to help fulfill the City's housing needs per the SCAG Regional Housing Needs Assessment. Therefore, although this project would represent a reduction in generating population growth, and a reduction in impacts associated with construction, the alternative provides less housing than the proposed project in relation to fulfilling the City's housing goals and Regional Housing Needs Assessment. All potential impacts to population and housing associated with the proposed project are less than significant. As such, this alternative does not reduce or eliminate any significant impacts associated with population and housing.
- Public Services – The development of this alternative would have fewer impacts to public services as that associated with the proposed project since there is a decrease in the intensity of development (i.e., less residential, retail and restaurant and no hotel development). However, although the impacts overall could be less, this alternative

would not result in a significant reduction of adverse impacts to public services (e.g., police, fire). The alternative would still place demands on existing public services not currently planned. Therefore, this alternative does not reduce or eliminate any significant impacts or unavoidable adverse impacts (e.g. fire) to public services.

- Recreation – This alternative would result in reduced impacts to recreation because of the reduction in potential residential development and no hotel development. However, this alternative does not eliminate impacts to recreation. All development projects (whether under this alternative or the proposed project) would be evaluated on a project-by-project basis and would be required to comply with applicable City requirements (e.g., payment of park impact fees and/or dedication of land. Therefore, while this alternative does reduce potential impacts; this alternative does not eliminate any significant impacts to recreation.
- Transportation – The alternative would result in fewer long-term traffic impacts than those of the proposed project, since there is a reduction in residential development, restaurant, retail, and hotel. The vehicle trips associated with the alternative compared to the project (13,397 average daily trips) would be different; however, all traffic impacts can be mitigated to a level of less than significant with the proposed DTSP Update. Therefore, this alternative does not reduce or eliminate any significant impacts to transportation.
- Utilities and Service Systems– This alternative would have fewer impacts to utilities and service systems than those associated with the proposed DTSP Update. The alternative would not result in a significant reduction of impacts to this topical area. Utilities and service systems would still need to be provided to the development just as with the proposed project. Additionally, all new development would be subject to review and evaluation for capacity needs and availability of service at the time the project development was brought forward for consideration.

In summary, the Conservative Market Demand Development Alternative would not reduce or eliminate significant environmental impacts. This alternative would still allow future potential development opportunities, but the uses would be slightly different than those of the proposed DTSP Update. Compared to the total net new development proposed under the DTSP Update, this alternative assumes 10,117 square feet less of retail uses, 16,549 square feet reduction in restaurant uses, 16,030 square feet additional office use, 400 fewer residential units, 30,000 square feet of cultural uses (same as proposed project), and no hotel rooms. Although, this alternative would have fewer impacts on air quality, hydrology/water quality, noise, public services, population and housing, transportation/parking, recreation, and utilities and service systems than those associated with the proposed project, there would not be a significant difference in the level of impacts. This alternative would not meet the project objectives identified for the proposed DTSP Update to the extent that the proposed project would. This alternative provides less housing, retail and restaurant, and no hotel development (promoting tourism/visitors) and potentially a reduction in increased revenues associated with retail, restaurant and hotel uses.

6.3 Reduced Development Alternative

This alternative would involve a proposed DTSP that would include a reduction in net new development. Therefore, this alternative would propose new development consisting of 106,735 square feet of retail uses, 46,166 square feet of restaurant uses, 46,392 square feet of office uses, 324 residential units, and 15,000 square feet of cultural arts facilities. This alternative assumes a 50% reduction in development compared to the proposed DTSP Update project. This amount was selected to create a project alternative that would be a reasonable and fair approach to determining whether a reduced development would meet project objectives, and reduce significant environmental impacts when compared to the proposed DTSP Update project.

- Aesthetics – This alternative could potentially reduce impacts associated with aesthetics only to the extent that less overall development in the area would occur. Additionally, the alternative’s lighting would be required to meet City design standards as with the proposed project. The difference in potential impacts to aesthetics would vary depending upon specific project details such as site location (e.g., parcel) and building/site design. Although this project alternative proposes a reduction in the overall amount of development, the alternative does not necessarily reduce or eliminate any significant impacts to aesthetics since future potential development opportunities would continue under this alternative that are beyond the currently allowed under the existing DTSP.
- Air Quality – The Reduced Development Alternative would result in reduced impacts to air quality compared to impacts of the proposed project, depending on the individual projects being brought forward for consideration and based on the overall 50% reduction in square footage, residential units, and hotel rooms. Since the long-term air quality impacts are associated primarily with vehicle emissions, the alternative would in essence reduce these emissions by half. Air quality impacts associated with construction activities would also be reduced since this alternative proposes a reduction in development. The air quality analysis prepared for the proposed DTSP Update has concluded that the project will result in potential significant and unavoidable impacts to air quality. Therefore, this alternative would result in a reduction in air quality impacts, but would not eliminate any significant or unavoidable impacts. This alternative would allow for development that would contribute to the cumulative impacts of air quality as with the proposed project. This contribution would be less but would not reduce a potentially significant impact to less than significant nor eliminate an unavoidable adverse impact to air quality.
- Cultural Resources – This alternative would not necessarily result in reduced impacts to cultural resources. Although, this alternative proposes a reduction in development, construction of new individual projects would continue under this alternative. All development projects would be evaluated on a project-by-project basis taking into consideration the individual project locations, construction, and design. Therefore,

this alternative does not reduce or eliminate any significant impacts to cultural resources.

- Geology/Soils – The Reduced Development Alternative does not reduce impacts to geology and soils from those associated with the proposed project. Individual projects that may be implemented under this alternative or the proposed project (DTSP Update) would most likely require site preparation including potential grading and excavation activities. Additionally, new development may possibly involve demolition of existing structures to accommodate new construction. Therefore, this alternative does not reduce or eliminate any significant impacts to geology/soils.
- Hazards/Hazardous Materials – All individual development projects would be evaluated on a project-by-project basis and would be required to comply with applicable requirements relative to hazards and/or hazardous materials (e.g., storage, transport). Although this alternative would provide for a reduction in the overall amount of new development, individual development projects could still be constructed. Therefore, this alternative does not reduce or eliminate any significant impacts to hazards/hazardous materials.
- Hydrology/Water Quality – The alternative would result in some reduction of impacts relative to hydrology and water quality. The alternative would continue to provide opportunity for new development to occur; however, the development would be 50% less than that proposed per the DTSP Update. The impacts associated with implementation of this alternative would be nearly the same as those of the proposed project since development would continue to occur. This alternative would require water and infrastructure connections, and would also have the same type and level of impacts to water quality as the proposed project. Therefore, potential impacts to hydrology and water quality would not be significantly less than those of the proposed project. All development projects would be subject to compliance with applicable hydrology/drainage and water quality requirements. This alternative does not reduce or eliminate any significant impacts to hydrology/water quality.
- Land Use and Planning – This project alternative would also require an amendment to the General Plan. As with the proposed DTSP Update, the project alternative would require amendments primarily consisting of text, table, and map revisions. Although the proposed project would amend to the General Plan (and ZSO), these amendments do not modify anything that would be for the purpose of avoiding and/or reducing a potential physical environmental impact. Therefore, other than providing a reduction in the amount of development, this alternative does not reduce or eliminate any significant impacts to land use and planning.
- Noise – This alternative could potentially result in fewer noise impacts than those of the proposed project due to the reduction in overall development. The project alternative (50% less development than that proposed under the DTSP Update) would

have fewer short-term impacts (e.g., construction activities, pile driving) and long-term noise (noise associated with increased traffic). Long-term noise associated with the project alternative and the proposed project would include traffic noise (vehicular trips), parking area noise, and noise commonly associated with urbanized development. The project alternative does not reduce a potentially significant impact or eliminate unavoidable adverse impacts (i.e., potential pile driving during construction of individual projects) to noise.

- Population and Housing – The alternative would generate additional population and housing but less than that of the DTSP Update. The DTSP Update would result in population growth of 1,562 persons. The alternative would then increase population by 781 persons. The alternative also would provide 324 additional housing units. However, with the proposed DTSP Update, the development potential that could occur would be 648 residential units. These potential units would serve to help fulfill the City's housing needs per the SCAG Regional Housing Needs Assessment. The Reduced Development Alternative does not meet the project objectives to the extent that the proposed project does. In addition, while this alternative would provide housing to meet the City's housing goals and regional need, it would not meet the housing needs to the extent that the proposed project would. Impacts to population and housing as a result of the proposed project were found to be less than significant. Therefore, the project alternative does not reduce or eliminate any significant impacts to population and housing.
- Public Services – The development of this alternative would have fewer impacts to public services than those associated with the proposed project since increased development would not occur as it would with the proposed DTSP Update. However, although the impacts overall could be less, this alternative would not result in a significant reduction of adverse impacts to public services (e.g., police, fire) or eliminate an unavoidable adverse impact to public services.
- Recreation – This alternative would not necessarily result in reduced impacts to recreation. The alternative would still increase population by 781 persons. However, all development projects would be evaluated on a project-by-project basis and would be required to comply with applicable City requirements (payment of park impact fees and/or dedication of land). Therefore, this alternative does not reduce or eliminate any significant impacts to cultural resources.
- Transportation - The alternative would result in less long-term traffic impacts than that of the proposed project. The vehicle trips associated with the alternative compared to the project are reduced 50%; however, all traffic impacts can be mitigated to a level of less than significant with the proposed DTSP Update. Development under this alternative would also result in impacts to traffic that would necessitate mitigation. Additionally, the DTSP Update proposes transportation/circulation options that would be a beneficial impact to the Downtown area, whereas

this alternative does not. Therefore, the project alternative does not reduce (to a level of less than significant) or eliminate significant impacts to transportation.

- Utilities and Service Systems – This alternative would have fewer impacts to utilities and service systems than those associated with the proposed DTSP Update. The alternative would not result in a significant reduction of impacts to this topical area. Utilities and service systems would still need to be provided to the development just as with the proposed project. Additionally, all new development would be subject to review and evaluation for capacity needs and availability of service at the time the project development was brought forward for consideration. Therefore, this alternative does not reduce or eliminate any significant impacts to utilities and service systems.

In summary, the Reduced Development Alternative would still allow future potential development opportunities but the uses would be 50% less than those of the proposed DTSP Update. Due to the reduction in the amount of overall development under this alternative, there would be fewer impacts on air quality, hydrology/water quality, noise, population and housing, public services, transportation/parking, recreation, and utilities and service systems than those associated with the proposed project. Although the impacts could be reduced, mitigation would still be needed in all of the same topical areas as the DTSP Update, since the mitigation pertains to reducing potential significant impacts of individual projects over a 20-year period. This alternative would meet some objectives of the project (but at reduced level), but would not meet all of the project objectives identified for the proposed DTSP Update. The alternative would provide less housing, office uses, cultural arts, and a reduction in potential increased revenues associated with retail, restaurant and hotel uses. The project alternative does not necessarily reduce significant impacts or eliminate any unavoidable adverse impacts.

6.4 Comparison of Proposed Project with Project Alternatives

Table 6.4.1 provides a comparison summary of the topical areas (e.g., aesthetics, air quality, transportation) of each alternative to the proposed project. In addition to an evaluation of the *physical* environmental impacts of each alternative, the alternatives have also been evaluated against the project objectives as stated in the Project Description of this EIR.

Table 6.4.1 Comparison of Proposed Project with Project Alternatives

Environmental Topic	No Project Alternative	Conservative Market Demand Alternative	Reduced Development Alternative
Aesthetics	–	=	=
Air Quality	–	–	–
Cultural Resources	–	=	=
Geology and Soils	–	=	=
Hazards/Hazardous Materials	–	=	=
Hydrology and Water Quality	–	–	–
Land Use and Planning	–	=	=
Noise	–	–	–
Population and Housing	–	–	–
Public Services	–	–	–
Recreation	–	–	–
Transportation	–	–	–
Utilities and Service Systems	–	–	–

– Project Alternative would have an impact less than the Proposed Project

+ Project Alternative would have an impact greater than the Proposed Project

= Project Alternative would have an impact comparable to the Proposed Project

6.5 Environmentally Superior Alternative

The No Project Alternative would be environmentally superior to the proposed project due to the reduction or avoidance of physical environmental impacts. Although the Conservative Market Demand Alternative does reduce impacts (primarily due to the reduction of 400 residential units) in some topical areas as shown in Table 6.4.1 above, the alternative does not reduce or eliminate *significant* impacts. Therefore, for these reasons the Conservative Market Demand Alternative is not considered environmentally superior to the project. CEQA Guidelines require that if the environmentally superior alternative is the No Project Alternative, “the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e] [2]). However, the Reduced Development Alternative would not be considered the environmentally superior alternative, as summarized in Table 6.4.1 since this alternative would not necessarily reduce significant impacts to a level of less than significant or eliminate any unavoidable adverse impacts (i.e., cultural resources, construction pile driving, etc.). Therefore, the No Project Alternative would still be considered environmentally superior to the proposed project. The No Project Alternative, while meeting the project objectives to some degree, does not meet all the project objectives.

7. References

1. City of Huntington Beach General Plan, including all its Elements
2. City of Huntington Beach, Draft Downtown Specific Plan No. 5, June 2009
3. City of Huntington Beach, Notice of Preparation and Initial Study, Downtown Specific Plan Update Project, dated February 4, 2009
4. City of Huntington Beach Local Coastal Program
5. Mestre Greve Associates Air Quality Assessment for Huntington Beach Downtown Specific Plan, City of Huntington Beach, April 13, 2009
6. Mestre Greve Associates Greenhouse Gas Assessment for Huntington Beach Downtown Specific Plan, City of Huntington Beach, April 13, 2009
7. Archeological Resource Management Corporation Report of Cultural Resources Records Search for Specific Plan of Huntington Beach, Orange County, California, January 30, 2009
8. Mestre Greve Associates Noise Assessment for the Huntington Beach Downtown Specific Plan, City of Huntington Beach, February 19, 2009
9. Kimley-Horn and Associates, Inc. Traffic Impact Analysis for City of Huntington Beach Downtown Specific Plan Update, June 2009
10. Title 14, State Historical Resources Commission, Regulations for the Nomination of Historical Resources to the California Register of Historical Resources
11. Regional Water Quality Control Boards geotracker website, <http://geotracker.waterboards.ca.gov/map/>
12. City of Huntington Beach Urban Water Management Plan, November 21, 2005
13. 2007 Drinking Water Quality Report, City of Huntington Beach, Utilities Division
14. Storm Water and Urban Runoff Management Permit Procedures, City of Huntington Beach Municipal Code No. 14.25
15. Southern California Association of Governments 2008 Regional Comprehensive Plan
16. Southern California Association of Governments Regional Transportation Plan, 2008
17. United States Census 2000, Bureau of Census
18. City of Huntington Beach Sewer Master Plan, 2003
19. Orange County Master Plan of Arterial Highways
20. Orange County Congestion Management Program
21. Highway Capacity Manual, 2000 Edition

7 - References

22. Downtown Huntington Beach Parking Master Plan Study, March 2009
23. South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993
24. Downtown Specific Plan Environmental Impact Report (EIR) 82-2 dated July 1983
25. State of California Assembly Bill AB 32 Global Warming Solutions Act of 2006
26. State of California, California Environmental Quality Act as amended January 1, 2007. §§21000-21178 of the *Public Resources Code*
27. Pacific City EIR prepared in 2003
28. State of California, Guidelines California Environmental Quality Act as amended effective July 27, 2007. §15000-15387 of the California *Code of Regulations*, Title 14, Chapter 3, State of California. <http://www.ceres.ca.gov/ceqa>
29. Waterfront Development Project EIR prepared in 2002
30. State of California Governor's Executive Order S-3-05
31. The Strand at Downtown Huntington Beach EIR
32. City of Huntington Beach Citywide Urban Runoff Management Plan, January 2005
33. State of California, Department of Finance Population Estimates, May, 2009

8. List of Persons and Organizations Consulted

This Environmental Impact Report was prepared for the City of Huntington Beach by Hodge & Associates. A list of persons and organizations consulted and involved with the preparation of this EIR is provided below (the lead agency, the environmental consultant, and the Specific Plan consultant are listed first, and the remainder of this section is in alphabetic order).

City of Huntington Beach

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8 - List of Persons and Organizations Consulted

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